

(Del. Rev. 11/14) Pro Se General Complaint Form

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

Ayrton Doerr

*(In the space above enter the full name(s) of the plaintiff(s).)*

-against-

University of Delaware

*(In the space above enter the full name(s) of the defendant(s).)*

*If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section I. Do not include addresses here.)*

Civ. Action No. 17 - 937

(To be assigned by Clerk's  
Office)

**COMPLAINT**  
(Pro Se)

Jury Demand?

☒ Yes

☐ No

**NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**

**Plaintiff**

Plaintiff:	<u>Ayrton Doerr</u>		
	<u>Name (Last, First, MI)</u>		
	<u>6 Hollow Brook Court</u>		
	<u>Street Address</u>		
	<u>Passaic</u>	<u>Wayne</u>	<u>NJ</u>
			<u>07470</u>
	<u>County, City</u>	<u>State</u>	<u>Zip Code</u>
	<u>973-309-4587</u>	<u>ayrtondoerr@aol.com</u>	
	<u>Telephone Number</u>	<u>E-mail Address (if available)</u>	

*List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.*

Defendant 1:	University of Delaware		
	Name (Last, First)		
	Street Address		
	New Castle, Newark	DE	19720
	County, City	State	Zip Code
Defendant 2:			
	Name (Last, First)		
	Street Address		
	County, City	State	Zip Code

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**Defendant(s) Continued**

Defendant 3:

\_\_\_\_\_  
Name (Last, First)

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
County, City

\_\_\_\_\_  
State

\_\_\_\_\_  
Zip Code

Defendant 4:

\_\_\_\_\_  
Name (Last, First)

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
County, City

\_\_\_\_\_  
State

\_\_\_\_\_  
Zip Code

**II. BASIS FOR JURISDICTION**

*Check the option that best describes the basis for jurisdiction in your case:*

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☒ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☒ **Federal Question:** Claim arises under the Constitution, laws or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

U. S. Constitution Amendments IV, V and XIV 42 U.S.C. §§ 1984, 1985 and 1986

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**III. VENUE**

*This court can hear cases arising out of the Counties of New Castle, Kent, and Sussex in the State of Delaware.*

*Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.*

Venue is appropriate in this Court because:

Defendant resides in Newark, New Castle County, Delaware

All events complained of occurred in New Castle County

**IV. STATEMENT OF CLAIM**

Place(s) of  
occurrence:

Newark, Delaware

Date(s) of occurrence: April 2014

*State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.*

**FACTS:**

1. The instant matter arises out of UDel's illegal, unconstitutional and unwarranted response to an incident that occurred at approximately 2:00 a.m. on April 19, 2014, at an apartment

complex located outside the confines of the UDel campus. Plaintiff Ayrton J. Doerr was one of three UDel students who were arrested and charged with assault and home invasion.

2. It was alleged that the three students entered an unlocked apartment complex on Wrightstown Lane, located outside of UDel's campus in Newark Delaware.

3. It was further alleged that all three of the suspects entered into the bedroom of a former

What  
happened to  
you?

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girlfriend [Russo] of one of the suspects [Lee] and allegedly assaulted a 22-year-old male [Zweifel] who was then involved in a sexual relationship with the 20-year-old Russo.

4. It was further alleged that all three of the suspects kicked, punched and struck Zweifel with a candle jar.

5. Together with Lee and Zweifel, I, Ayrton J. Doerr was a member of the UDel Hockey Team, and considered both Lee and Zweifel my friends. I denied all of the allegations and pled

"Not Guilty" to the charges. I consistently asserted that I was at the scene intending to prevent a violent confrontation between Lee and Zweifel. Both Zweifel and Russo

them were friends and teammates. No witness ever claimed that I physically assaulted Zweifel and, in fact, Zweifel specifically acknowledged to the police investigators his belief that I would

never have harmed him. In response to the criminal charges, I engaged local counsel who advised me not to make any statements regarding the incident.

6. Five days after the incident, UDel, acting through its agent, Kathryn Goldman summarily suspended me from the University. Within 10 days of the incident, the UDel Office of Student

Conduct conducted a hearing on charges that I (in complicity with Andrew Lee and Jason Zimmer) violated the UDel Student Code of Conduct. The Code of Conduct prohibits students

from: "Trespassing or the unauthorized entering or accessing of any University building, facility, property, service, resource or activity or any location within the jurisdictional boundaries of the

Student Conduct System." [Emphasis added].

7. Although Plaintiff was present during the hearing, on advise of counsel I refused to

answer any questions or give a substantive account, but generally denied any wrongdoing. Based solely upon information provided by William Wentz, Russo and a Newark detective, I was

declared to have engaged in violent, disruptive and reckless conduct in violation of the Code of Student Conduct and was expelled from the University of Delaware and barred from the campus

and any grounds or facilities owned or maintained by UDel.

8. At the time of the unlawful expulsion, I was less than a month short of completing my

3rd year of college and had already been selected as Captain of the UDel Hockey Team for the upcoming year.

9. As a result of the defendants' unlawful actions, I was humiliated, insulted and threatened by various individuals within the Udel community as well as defamed by local and regional

Was anyone  
else  
involved?

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media. I was unable to complete my education, and was denied the opportunity to compete in the sport I love. I was denied the opportunity to see my hockey jersey hung in the arena, and my parents and siblings were denied the satisfaction of watching me receive a diploma from the University of Delaware at a graduation ceremony. I became despondent, anxious and depressed

10. Criminal Charges were never presented to a grand jury. On February 3, 2016 the Attorney General of the State of Delaware closed the criminal investigation by filing a Notice of Nolle Prosequi in the matter.

Who did  
what?

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**V. INJURIES**

*If you sustained injuries related to the events alleged above, describe them here.*

Expulsion from University

Delay in obtaining degree/loss of income

Loss of Team Captaincy

Defamation of Character

Invasion of Privacy

**VI. RELIEF**

The relief I want the court to order is:

☒ Money damages in the amount of: \$ 250,000.00

☐ Other (explain):

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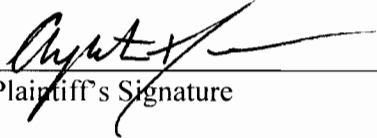
## VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; and (3) complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

July 7, 2017

Dated

  
Plaintiff's Signature

Ayrton Doerr

Printed Name (Last, First, MI)

6 Hollow Brook Ct  
Address

Wayne  
City

New Jersey  
State

07470  
Zip Code

973-309-4587

Telephone Number

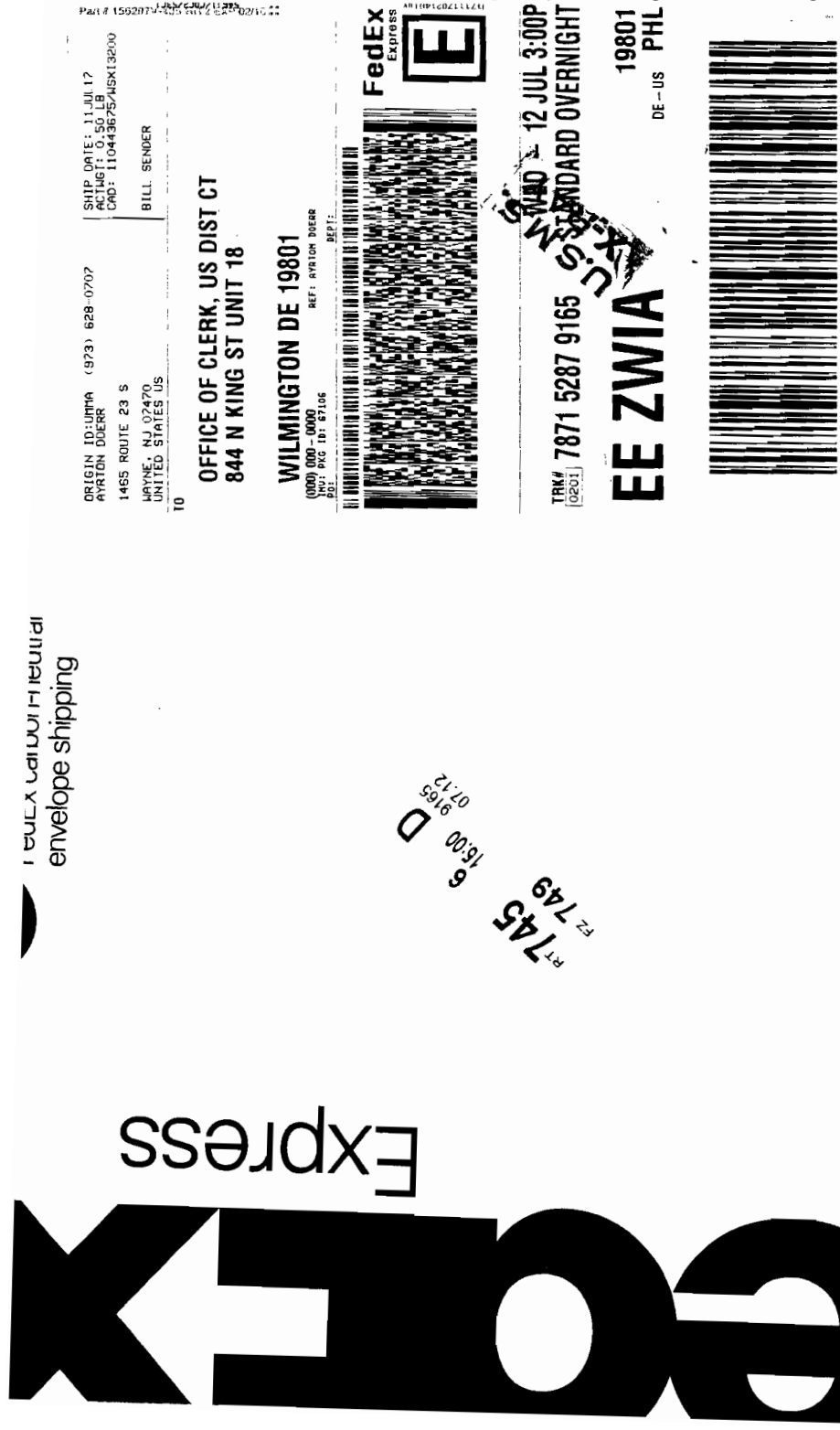
ayrtondoerr@aol.com

E-mail Address (if available)

*List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.*

**Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.**





FedEx carrier handling  
envelope shipping

Express

RT 745  
EZ 749  
16:00  
D 9165  
07:12